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Date: March 4, 2021

To: Coordinated care organizations

From: Dave Inbody, CCO Operations Manager
Chris DeMars, Transformation Center Director

Subject: Clarification about SHARE Initiative SDOH-E Partner contract requirements

This communication is regarding the requirements for SDOH-E¹ Partner contracts for Supporting Health for All through REinvestment (SHARE) Initiative funds in the coordinated care organization (CCO) 2.0 contracts effective January 1, 2021 (CY 2021).

Exhibit K, Section 8, Paragraph a. of the CY 2021 CCO Contract refers to the CCO executing a Subcontract or Memorandum of Understanding (MOU) with each SDOH-E Partner to which the CCO provides funds through the SHARE Initiative. Further, Subparagraph (1) of the same states that the Subcontract or MOU must comply with all of the Subcontract requirements in Exhibit B, Part 4, Section 11 of the CCO Contract.

Oregon Administrative Rules (OARs) pertaining to the SHARE Initiative describe the SDOH-E Partner contract requirements differently. OAR 410-141-3735(3)(c) states:

(c) A portion of SHARE Initiative dollars must go directly to SDOH-E Partner(s) for the delivery of services or programs, policy, or systems change, or any of these, to address the social determinants of health and equity as agreed by the CCO. **CCOs shall enter into a contract, a Memorandum of Understanding, or other form of agreement including a grant agreement, with each SDOH-E Partner** [emphasis added] that defines the services to be provided and the CCO's data collection methods as provided in the contract between the Authority and the CCO.

The OAR provides more options than the CCO Contract for the type of written agreement between the CCO and SDOH-E Partners. Consistent with the order of precedence described in General Provisions, Section 4.3.2 of the CCO Contract, the above OAR takes precedence over the CCO Contract with respect to the type of written agreement between the CCO and SDOH-E Partners for SHARE Initiative funds.

As several of the options described in OAR 410-141-3735(3)(c) need not be Subcontracts as defined in OAR 410-141-3500(67), the SDOH-E Partner contract (if not a Subcontract) is not required to comply with the Subcontract requirements in Exhibit B, Part, 4, Section 11 of the CCO Contract. Further, since the SDOH-E Partner contract need not be a Subcontract, the requirement in Exhibit K, Section 8, Paragraph a. of the CCO Contract to submit a Subcontractor and Delegated Work Report updated for the SDOH-E Partner contracts applies only if the SDOH-E Partner contract is a Subcontract. OHA hereby waives this deliverable for SDOH-E Partner contracts that are not Subcontracts.

¹ SDOH-E encompasses three different and interrelated terms: social determinants of health (SDOH), social determinants of equity (SDOE), and health-related social needs (social needs).

The CCO shall ensure that its written agreement with each SDOH-E Partner, if not a Subcontract, meets the following minimum requirements:

- (a) Contract term and budget;
- (b) Legal names for all entities;
- (c) SDOH-E domain(s), as specified in OAR 410-141-3735(3)(b), in which the SDOH-E Partner provides services;
- (d) How CCO will distribute funds to the SDOH-E Partner, including distribution schedule and allowable percentage of indirect costs;
- (e) The scope of work to be performed, including:
 - i. Specific services to be provided; and
 - ii. Which populations will be provided services (e.g., CCO Members, Community members, Tribal communities, communities of color, etc.).
- (f) How outcomes will be measured and evaluated, including:
 - i. Specific, Measurable, Achievable, Relevant and Time-based (SMART) objectives; and
 - ii. How outcomes align with community priorities from the CCO's Community Health Improvement Plan (CHP).
- (g) Data collection, sharing, and reporting obligations of both the SDOH-E Partner and the CCO, including:
 - i. The data elements to be collected by the SDOH-E Partner and/or the CCO;
 - ii. How data is related to outcomes; and
 - iii. Process and frequency of submission of reports and/or data exchange between SDOH-E Partner and CCO.

Questions?

If you have general questions about this communication, please contact Cheryl Henning, CCO Contracts Administrator, at Cheryl.L.Henning@dhsosha.state.or.us.

If you have questions about the SHARE Initiative, please contact OHA at SHARE.Initiative@dhsosha.state.or.us.

Thank you for your continued support of the Oregon Health Plan and the services you provide to our members.